Ms. Jill Wood TFSA Torx Operations 4366 N. Old US Highway 31 Rochester, IN 46975

Re: Registered Construction and Operation Status, 049-13660-00023

Dear Ms. Wood:

The application from TFSA Torx Operations, received on December 22, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following fabricated metal production operation to be located at 4366 N. Old US Highway 31, Rochester, Indiana, is classified as registered:

- (a) Two (2) nut former machines with a maximum throughput of 1,630 gallons of oil per year per nut former, connecting to one (1) existing Trion electrostatic precipitator which controls oil mist and exhausts to a stack designated as #7.
- (b) One (1) nut former machine with a maximum throughput of 1,630 gallons of oil per year, connecting to one (1) existing Trion electrostatic precipitator which controls oil mist and exhausts to a stack designated as #8.
- (c) Two (2) natural gas-fired air make-up units, designated as AE-1 and AE-2, with a maximum heat input capacity of 5.661 mmBtu/hr each and exhaust to the atmosphere.
- (d) One (1) natural gas-fired air make-up unit, designated as AE-3, with a maximum heat input capacity of 2.733 mmBtu/hr and exhausts to the atmosphere.
- (e) One (1) alkaline parts washing system, with a maximum capacity of 9,000 pounds of low carbon steel per hour and consists of the following equipment:
  - (1) One (1) natural gas-fired parts washer heater, with a maximum heat input capacity of 6.0 mmBtu/hr and exhausts to a stack designated as Stack #4; and
  - One (1) parts washer using an alkaline detergent and exhausts to a stack designated as Stack #3.
- (f) One (1) natural gas-fired heated alkaline pan washer, with a maximum heat input capacity of 0.8 mmBtu/hr and exhausts to a stack designated as Stack #48.
- (g) One (1) natural gas-fired wastewater evaporator, with a maximum heat input capacity of 0.75 mmBtu/hr and exhausts to a stack designated as Stack#28.
- (h) Three (3) natural gas-fired thermolyne furnaces, with a maximum heat input capacity of 0.4 mmBtu/hr each and exhausts to stacks designated as Stack #17, Stack #18 and Stack #19.
- (i) One (1) natural gas-fired roof mounted heating and air condition unit, with a maximum heat input capacity of 0.1216 mmBtu/hr and exhausts to a stack designated as Stack #20.
- (j) Seven (7) natural gas-fed roof mounted heating and air conditioning units, with a maximum heat input capacity of 0.225 mmBtu/hr each and exhaust to stacks designated as Stack #21, Stack #22, Stack #24, Stack #28a, Stack # 29, Stack #30 and Stack #31.

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(k) Two (2) natural gas-fired roof mounted heating and air condition units, with a maximum heat input capacity of 0.08 mmBtu/hr each and exhaust to stacks designated as Stack #23 and Stack #26.

- (I) One (1) natural gas-fired roof mounted heating and air conditioning unit, with a maximum heat input capacity of 0.275 mmBtu/hr and exhausts to a stack designated as Stack # 25.
- (m) One (1) natural gas-fired roof mounted heating and air conditioning unit, with a maximum heat input capacity of 0.05 mmBtu/hr and exhausts to a stack designated as Stack # 27.
- (n) One (1) electric chip separator.
- (o) Fifteen (15) satellite cleaning stations with a maximum solvent usage rate of 4.27 pounds of solvent per hour and exhausts to the atmosphere.
- (p) One (1) cold header operation, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour, with a maximum capacity of 6,000 gallons of lubricating oil per year, equipped with one (1) Trion electrostatic precipitator to control oil mist and exhausts to a stack designated as Stack #6.
- (q) Two (2) cold header operations, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour per operation, with a maximum capacity of 6,000 gallons of lubricating oil per year per operation, equipped with one (1) Trion electrostatic precipitator to control oil mist and exhaust to stacks designated as Stack #7 and Stack #8.
- (r) One (1) threading operation, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour.

The following conditions shall be applicable:

- 1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.
- 2. Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- 3. Pursuant to 326 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:
  - (a) equip the cleaner with a cover;
  - (b) equip the cleaner with a facility for draining cleaned parts;
  - (c) close the degreaser cover whenever parts are not being handled in the cleaner;

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(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

- (e) provide a permanent, conspicuous label summarizing the operating requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- 4. Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),
  - the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
    - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
      - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
      - (B) the solvent is agitated; or
      - (C) the solvent is heated.
    - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
    - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
    - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
    - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
      - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
      - (B) A water cover when solvent used is insoluble in, and heavier than, water.

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(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

This registration is a registration renewal issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

NLJ

cc: File - Fulton County
Fulton County Health Department
Air Compliance - Paul Karkiewcz
Northern Regional Office
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

# Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	TFSA Torx Operations	
Address:	4366 N. Old Highway 31	
City:	Rochester	
Authorized individual: Jill Wood		
Phone #:	219-223-9329	
Registration #:	049-13660-00023	

I hereby certify that TFSA Torx Operations is still in operation and is in compliance with the requirements of Registration **049-13660-00023**.

Name (typed):	
Title:	
Signature:	
Date:	

## Indiana Department of Environmental Management Office of Air Quality

## Technical Support Document (TSD) for a Registration

## **Source Background and Description**

Source Name: TFSA Torx Operations (formerly known as Torx Products, Division of

Camcar Textron)

Source Location: 4366 N. Old US Highway 31, Rochester, IN 46975

County: Fulton SIC Code: 3452

Operation Permit No.: 049-13660-00023 Permit Reviewer: Nysa L. James

The Office of Air Quality (OAQ) has reviewed an application from TFSA Torx Operations relating to the operation of a fabricated metal production operation.

## **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) nut former machines with a maximum throughput of 1,630 gallons of oil per year per nut former, connecting to one (1) existing Trion electrostatic precipitator which controls oil mist and exhausts to a stack designated as #7.
- (b) One (1) nut former machine with a maximum throughput of 1,630 gallons of oil per year, connecting to one (1) existing Trion electrostatic precipitator which controls oil mist and exhausts to a stack designated as #8.
- (c) Two (2) natural gas-fired air make-up units, designated as AE-1 and AE-2, with a maximum heat input capacity of 5.661 mmBtu/hr each and exhaust to the atmosphere.
- (d) One (1) natural gas-fired air make-up unit, designated as AE-3, with a maximum heat input capacity of 2.733 mmBtu/hr and exhausts to the atmosphere.
- (e) One (1) alkaline parts washing system, with a maximum capacity of 9,000 pounds of low carbon steel per hour and consists of the following equipment:
  - (1) One (1) natural gas-fired parts washer heater, with a maximum heat input capacity of 6.0 mmBtu/hr and exhausts to a stack designated as Stack #4; and
  - (2) One (1) parts washer using an alkaline detergent and exhausts to a stack designated as Stack #3.
- (f) One (1) natural gas-fired heated alkaline pan washer, with a maximum heat input capacity of 0.8 mmBtu/hr and exhausts to a stack designated as Stack #48.
- (g) One (1) natural gas-fired wastewater evaporator, with a maximum heat input capacity of 0.75 mmBtu/hr and exhausts to a stack designated as Stack#28.

- (h) Three (3) natural gas-fired thermolyne furnaces, with a maximum heat input capacity of 0.4 mmBtu/hr each and exhausts to stacks designated as Stack #17, Stack #18 and Stack #19.
- (i) One (1) natural gas-fired roof mounted heating and air condition unit, with a maximum heat input capacity of 0.1216 mmBtu/hr and exhausts to a stack designated as Stack #20.
- (j) Seven (7) natural gas-fed roof mounted heating and air conditioning units, with a maximum heat input capacity of 0.225 mmBtu/hr each and exhaust to stacks designated as Stack #21, Stack #22, Stack #24, Stack #28a, Stack # 29, Stack #30 and Stack #31.
- (k) Two (2) natural gas-fired roof mounted heating and air condition units, with a maximum heat input capacity of 0.08 mmBtu/hr each and exhaust to stacks designated as Stack #23 and Stack #26.
- (I) One (1) natural gas-fired roof mounted heating and air conditioning unit, with a maximum heat input capacity of 0.275 mmBtu/hr and exhausts to a stack designated as Stack # 25.
- (m) One (1) natural gas-fired roof mounted heating and air conditioning unit, with a maximum heat input capacity of 0.05 mmBtu/hr and exhausts to a stack designated as Stack # 27.
- (n) One (1) electric chip separator.
- (o) Fifteen (15) satellite cleaning stations with a maximum solvent usage rate of 4.27 pounds of solvent per hour and exhausts to the atmosphere.
- (p) One (1) cold header operation, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour, with a maximum capacity of 6,000 gallons of lubricating oil per year, equipped with one (1) Trion electrostatic precipitator to control oil mist and exhausts to a stack designated as Stack #6.
- (q) Two (2) cold header operations, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour per operation, with a maximum capacity of 6,000 gallons of lubricating oil per year per operation, equipped with one (1) Trion electrostatic precipitator to control oil mist and exhaust to stacks designated as Stack #7 and Stack #8.
- (r) One (1) threading operation, with a maximum throughput of 445 pounds of low carbon stainless steel, brass or alloy steel per hour.

#### **Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
2 and 3	parts washer and rinse bath	25.0	1.00	435	1000
4	alkaline parts washing system	25.0	1.6	5000	1000
6-8	cold header operations	31.0	4.00	20,000	140
17, 18 and 19	thermolyne furnaces	22.0	0.6	66.0	1000
20-27	roof mounted heating and air condition units	25.0	0.5	0.4	180

28	wastewater evaporator	25.0	0.6	2000	1000
28a and 29	roof mounted heating and air condition units	25.0	0.5	0.4	140
30 and 31	roof mounted heating and air condition units	25.0	0.5	N/A	N/A
48	alkaline pan washer	25.0	0.8	1500	200

#### Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 22, 2000, with additional information received on January 31, 2001.

#### **Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Four (4) pages).

## **Potential To Emit of Source Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	5.88
PM-10	5.88
SO <sub>2</sub>	0.07
VOC	1.93
CO	9.05
NO <sub>x</sub>	10.8

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5.

## **County Attainment Status**

The source is located in Fulton County.

Pollutant	Status	
PM-10	attainment	
SO <sub>2</sub>	attainment	
$NO_2$	attainment	

Ozone	attainment	
СО	attainment	
Lead	attainment	

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Fulton County has been classified as attainment or unclassifiable for PM<sub>10</sub>, CO and SO<sub>2</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## **Source Status**

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.71
PM10	1.71
SO <sub>2</sub>	0.07
VOC	1.93
CO	9.05
$NO_x$	10.8

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

## Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **R-049-13660-00023**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The fifteen (15) satellite cleaning stations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the solvent used by the cleaning stations does not contain any compounds listed in 40 CFR Part 63.460.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

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## State Rule Applicability - Entire Source

## 326 IAC 2-6 (Emission Reporting):

This source is located in Fulton County and the potential to emit NOx and CO are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

## 326 IAC 5-1 (Visible Emissions Limitations):

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Fifteen (15) satellite cleaning stations

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)):

The operation of cleaning stations will not emit any HAPs. Therefore, 326 IAC 2-4.1 does not apply.

No 326 IAC 6 rules apply because there are no PM emissions from these stations.

## 326 8-3-2 (Cold Cleaner Operation):

Pursuant to 326 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operating requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

## 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control):

Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control),

- (a) the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

- (B) the solvent is agitated; or
- (C) the solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and ninetenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

No other 326 IAC 8 rules apply to the cleaning stations.

## State Rule Applicability - Cold Header Operations

326 IAC 6-3-2(c) (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour):

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

TFSA Torx Operations Rochester, Indiana Permit Reviewer: NLJ

326 IAC 8-1-6 (New facilities; general reduction requirements):

326 IAC 8-1-6 does not apply to these operations since there are no VOC emissions.

## **State Rule Applicability - Nut Former Machines**

326 IAC 6-3-2(c) (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour):

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

326 IAC 8-1-6 (New facilities; general reduction requirements):

326 IAC 8-1-6 does not apply to these operations since there are no VOC emissions.

## Conclusion

The operation of this fabricated metal production operation shall be subject to the conditions of the attached proposed **Registration 049-13660-00023**.